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COMMITTEE:	JOINT AUDIT AND STANDARDS COMMITTEE
DATE:	MONDAY, 25 SEPTEMBER 2023 10.30 AM
VENUE:	KING EDMUND CHAMBER, ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH

Members		
<u>Conservative</u> Isabelle Reece John Whitehead	<u>Green Party</u> Austin Davies Simon Dowling John Matthissen (Joint-Chair) James Patchett Tim Regester	<u>Independent</u> Mary McLaren <u>Liberal Democrat</u> Bryn Hurren (Joint-Chair) Adrienne Marriott

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AGENDA

PART 1

MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT

Page(s)

- 1 **SUBSTITUTES AND APOLOGIES**
- 2 **DECLARATION OF INTERESTS**

Members to declare any interests as appropriate in respect of items to be considered at this meeting.
- 3 **JAC/23/07 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 31 JULY 2023** 5 - 12
- 4 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

5 **QUESTIONS BY THE PUBLIC**

To consider questions from, and provide answers to, the public in relation to matters which are relevant to the business of the meeting and of which due notice has been given in accordance with the Committee and Sub-Committee Procedure Rules.

6 **QUESTIONS BY COUNCILLORS**

To consider questions from, and provide answer to, Councillors on any matter in relation to which the Committee has powers or duties and of which due notice has been given in accordance with the Committee and Sub-Committee Procedure Rules.

7 **JAC/23/08 REVIEW OF THE DELIVERY OF THE 2023 DISTRICT, TOWN & PARISH ELECTIONS** 13 - 52

8 **JAC/23/09 ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) UPDATE** 53 - 58

9 **EXCLUSION OF THE PUBLIC (TERM WHICH INCLUDES THE PRESS)**

To consider whether, pursuant to Part 1 of Schedule 12A of the Local Government Act 1972, the public should be excluded from the meeting for the business specified below on the grounds that if the public were present during this/these item(s), it is likely that there would be the disclosure to them of exempt information as indicated against the/each item.

The author(s) of the report(s) proposed to be considered in Part 2 of the Agenda is/are satisfied that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

PART 2

10 **JAC/23/09 ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) UPDATE - CONFIDENTIAL APPENDICES** 59 - 82

11 **RE-ADMITTANCE OF THE PUBLIC (WHICH TERM INCLUDES THE PRESS)**

PART 1

12 **JAC/23/10 FORWARD PLAN** 83 - 84

Date and Time of next meeting

Please note that the next meeting is scheduled for Monday, 27 November 2023 at 10.30 am.

Webcasting/ Live Streaming

The Webcast of the meeting will be available to view on the Councils YouTube page:
https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg

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Introduction to Public Meetings

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Agenda Item 3

BABERGH AND MID SUFFOLK DISTRICT COUNCILS

Minutes of the meeting of the **JOINT AUDIT AND STANDARDS COMMITTEE** held in the Frink Room (Elisabeth) - Endeavour House on Monday, 31 July 2023

PRESENT:

Chair: Bryn Hurren (Joint-Chair)

Councillors: Simon Dowling
Adrienne Marriott
Mary McLaren
Isabelle Reece
John Whitehead

John Matthissen (Joint-Chair)
James Patchett
Tim Register

In attendance:

Councillors: Rachel Eburne
John Ward

Guest: David Green – Arlingclose Strategic Director

Officers: Chief Executive (AE)
Deputy Monitoring Officer and Corporate Manager Governance & Civic Office (JR)
Corporate Manager – Internal Audit (JS)
Corporate Manager – Finance, Commissioning & Procurement (BP)
Governance Officer (BW)

Apologies:

Austin Davies

1 SUBSTITUTES AND APOLOGIES

1.1 Apologies were received by Councillor Austin Davies.

2 DECLARATION OF INTERESTS

2.1 None received.

3 JAC/23/01 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 22 MARCH 2023

By 1 vote For and 8 Abstentions.

It was **RESOLVED**: -

That the minutes of the meeting held on the 22nd March 2023 be confirmed and signed as a true record.

4 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME

4.1 None received.

5 QUESTIONS BY THE PUBLIC

5.1 None received.

6 QUESTIONS BY COUNCILLORS

6.1 None received.

7 JAC/23/02 TREASURY MANAGEMENT OUTTURN 2022/23

7.1 The Chair invited David Green, Arlingclose Strategic Director, to present an update on the Treasury Management Process.

7.2 Councillor Hurren queried whether local government borrowing was one to one. The Arlingclose Strategic Director responded that this was a one-to-one borrowing scheme and that brokers would find lenders that fit the specified requirements.

7.3 Councillor Register questioned how it was ensured that inflation rates and interest rates were correct. The Arlingclose Strategic Director responded that the Bank of England has an interest rate at 2% and this would rise with inflation.

7.4 Councillor Matthissen queried whether most borrowing from local authorities was short term. The Arlingclose Strategic Director responded that timelines for borrowing were often 3, 6, or 12 months. Shorter term borrowing usually had smaller interest rates meaning that it is often cheaper to borrow short term over long term.

7.5 Councillor McLaren questioned if the Councils lent money to other local authorities. The Arlingclose Strategic Director responded that the Councils do not lend money but if they wanted to in the future it was an option.

7.6 Councillor Patchett queried what the interest rate was on the £4million bank loan taken by Mid Suffolk. The Corporate Manager – Finance, Commissioning and Procurement responded that the loan had an interest rate of 4.12%.

7.7 Councillor Patchett further questioned why reserve funds were not being used to pay back the loan sooner. The Corporate Manager – Finance, Commissioning and Procurement responded that as the loan was a Lender's Option Borrower's Option (LOBO), and it was down to the bank to determine the rate at which it was paid back. Information on repayment costs would be provided outside of the meeting.

- 7.8 The Chief Executive asked for clarification on whether the information on comparative income applied to all income or non-ringfenced funds. The Arlingclose Strategic Director responded that it applied to non-ringfenced funds and did not include income such as council tax.
- 7.9 The Chair thanked the Arlingclose Strategic Director for his presentation.
- 7.10 The Chair invited the Corporate Manager Finance, Commissioning & Procurement to introduce the report to the committee.
- 7.11 Councillor Dowling referred to page 14 of the report and questioned whether the Cabinet were pushing back on fund managers to consider carbon reduction since it was agreed in 2021. Councillor Eburne responded that this had not been a priority for the previous administration, but this would now be carried forward. The Corporate Manager – Finance, Commissioning & Procurement added that the committee could advise Cabinet to carry this forward.
- 7.12 Councillor Matthissen referred to table 1 in the report and questioned what the movement of funds had been. The Corporate Manager Finance, Commissioning & Procurement responded that due to capital financing requirements there is the need for the councils to borrow and where capital schemes are undertaken the Capital Funding Requirement (CFR) increases.
- 7.13 Councillor Matthissen queried the figure of £11Million spend on Council houses. The Corporate Manager – Finance, Commissioning & Procurement responded that this figure included capital repairs to council properties.
- 7.14 Councillor Whitehead referred to paragraphs 1.11 and 1.12 on page 27 of the report and queried why the average returns for the councils were significantly higher compared to other clients of Arlingclose. The Corporate Manager – Finance, Commissioning & Procurement responded that Mid Suffolk were seen to be significantly higher, although this did not apply to Babergh.
- 7.15 Councillor Whitehead queried why there was no benchmarking data for funds and whether this could be included in future reports. The Arlingclose Strategic Director responded that investment values were down and measuring at a downturn.
- 7.16 Councillor Ward requested that all tables showed the split between the borrowing for the General Fund budget and the Housing Revenue Account.
- 7.17 Councillor Ward queried the interest rates for CIFCO and why they differed in table 6 and table 7. The Corporate Manager – Finance, Commissioning & Procurement responded that these were partially due to rounding differences and also on the interest paid on funding for works.
- 7.18 Councillor Eburne questioned where capital receipts were shown in the

report. The Corporate Manager – Finance, Commissioning & Procurement stated that it was contained in table 15 in the report under use of finance expenditure.

7.19 Councillor Hurren proposed the recommendations as set out in the report. Councillor Whitehead seconded this proposal.

By a unanimous vote

It was RESOLVED: -

That the treasury management activity for the year 2022/23 as set out in this report and appendices be noted.

By a unanimous Babergh vote

It was Recommended to Babergh Council: -

That it be noted that both Councils activity was in accordance with the approved Prudential Indicators for 2022/23.

That it be noted that Babergh District Council's treasury management activity for 2022/23 was in accordance with the approved Treasury Management Strategy, and that, aside from exceeding the net upper limit of interest rate exposure at the end of 2022/23 as mentioned in Appendix C, paragraph 4.1, the Council has complied with all the Treasury Management Indicators for this period.

By a unanimous Mid Suffolk vote

It was Recommended to Mid Suffolk Council: -

That it be noted that both Councils activity was in accordance with the approved Prudential Indicators for 2022/23.

That it be noted that Mid Suffolk District Council's treasury management activity for 2022/23 was in accordance with the approved Treasury Management Strategy, and that, except for one occasion when the Council exceeded its daily bank account limit with Lloyds, as mentioned in Appendix C, paragraph 4.1, the Council has complied with all the Treasury Management Indicators for this period.

7.20 A short comfort break was taken between 12:08 – 12:19pm.

8 JAC/23/03 ANNUAL GOVERNANCE STATEMENT 2022/23

8.1 The Chair invited the Chief Executive to introduce the report.

8.2 Councillor McLaren requested that in future a list of officers be circulated to Members with the report to give clarity on who contributed.

8.3 Councillor McLaren questioned what the process is if something is questioned. The Corporate Manager – Internal Audit responded that depending on the severity of the allegation a line manager can be approached as well as the Section 151 Officer, Monitoring Officer, Chief Executive, and Corporate Manager – Internal Audit could also be approached. This also tied into the whistleblowing policy.

8.4 Councillor McLaren questioned how comfortable it was for people to share whistleblowing allegations. The Corporate Manager – Internal Audit responded that developing an environment and behaviour of openness within the organisation makes it easier for people to approach officers with their concerns.

8.5 Councillor Matthissen referred to page 58 of the report and enquired where the End of Term report was published. The Corporate Manager – Internal Audit responded that the report was published every 4 years. The Chief Executive added that an annual report would go to each council to monitor how services were delivered in relation to the corporate plan.

8.6 Councillor Matthissen queried where freedom of information request responses were published on the website. The Corporate Manager – Internal Audit responded that when a request is made a disclosure log of previous enquiries is available if the information is not sensitive or in the public interest.

8.7 Councillor Dowling queried how items for improvement could be ensured to be pursued and how this tied into the improvement roadmap. The Chief Executive responded that there were agreed timescales on these issues and that in the next report there would be the opportunity to see what improvement had been made.

8.8 Councillor Dowling further questioned when the continuous improvement roadmap would be available. The Corporate Manager – Strategic Policy responded that the roadmap relied on the new corporate plan and would be in place in 2024 but the development of the plan was currently in progress. The Chief Executive added that performance indicators were currently team specific and there would be additional ones that would go to full Council and Cabinet.

8.9 Councillor Marriott queried how it was ensured that recommendations were acted on. The Corporate Manager – Internal Audit responded that high risk items were followed up on, and areas of limited assurance were revisited within 3-6 months. Additionally half year and annual reports are produced and any recommendations not implemented were escalated to the Deputy Chief Executive or Chief Executive, with external audit being brought in when required.

8.10 Councillor McLaren queried the annual suppliers spend and how this compared to neighbouring Councils. The Corporate Manager – Finance, Commissioning & Procurement responded that these figures would be

provided outside of the meeting. The Chief Executive added that as Councils are not consistent these numbers may not be comparative as Babergh and Mid Suffolk are rural districts and two authorities.

8.11 Councillor Register questioned how procurement ensure that contracts are not at an inflated cost. The Corporate Manager – Finance, Commissioning & Procurement responded that when a contract is required the specifications are drawn up and procurement find and manage the contract and use their professional knowledge to judge what costs are reasonable.

8.12 Councillor McLaren proposed the recommendation as set out in the report. Councillor Matthissen seconded the motion.

By a unanimous vote

It was RESOLVED: -

1.1 That Councillors satisfy themselves that the Local Code of Corporate Governance and joint Annual Statement (AGS) 2022/23 (Appendix A and B respectively to this report) accurately reflects the governance environment and any actions to improve it.

1.2 That subject to 1.1 above, the AGS be endorsed subject to the Director – Law & Governance and Monitoring Officer being authorised to make any minor amendments and corrections prior to the Statement being finalised for publication.

1.3 Further that approval of any significant amendments identified by the Director – Law & Governance and Monitoring Officer be delegated to him in consultation with the Chairs of this Committee and the Leaders of each Council.

1.4 That it be noted that the finalised AGS will be signed by the Leader of each Council on behalf of the respective Council together with the Chief Executive on behalf of both Councils.

9 JAC/23/04 ANNUAL INTERNAL AUDIT REPORT 2022/23

9.1 The Chair invited the Corporate Manager - Internal Audit to introduce the report.

9.2 Councillor Marriott asked for further detail on the levels of risk. The Corporate Manager – Internal Audit responded that there were general areas of concern such as the general ledger and regular reconciliations where the process had not been followed properly and had been identified and the Section 151 Officer had produced a report providing an overview of how the systems work and how improvements can be made. The Corporate Manager – Finance, Commissioning & Procurement added that business process reengineering was ongoing with external consultants and all of the processes

within the team had been mapped, and processes for the new finance management system had been put in place.

9.3 Councillor Matthissen queried what the issues with the elections in the report referred to. The Corporate Manager – Internal Audit responded that there were reconciliation cost issues with the May 2021 election where it was identified that more robust controls were required in the reconciliation process, and the lack of business continuity plans in place in times of staff changeover. The Chief Executive responded that as there had been a change in Corporate Manager in the elections team during the reconciliation process this led to a lack of continuity in the process.

9.4 Councillor Hurren highlighted that continuity plans should be in place for all departments in case of staff turnover.

9.5 Councillor Patchett questioned whether process notes and continuity plans were available for the 2023 election following the recommendation from the 2021 election. The Corporate Manager – Internal Audit responded that these were recommendations for the team moving forward and it was hoped that this would be implemented.

9.6 Councillor McLaren queried safeguarding training for taxi drivers. The Corporate Manager – Internal Audit responded that the previous safeguarding policy was out of date and was not seen to be fit for purpose. Whilst the policies were good the training needed to be updated.

9.7 Councillor Matthissen enquired how government grants were checked. The Corporate Manager – Internal Audit responded that he is required to provide a declaration and check where the funds are spent and has asked to be involved in the process sooner.

9.8 Councillor Register proposed the recommendations as set out in the report. Councillor Patchett seconded the motion.

By a unanimous vote.

It was RESOLVED: -

1.1 The Committee is asked to:

1.1.1 Consider and support the conclusion that the Councils' system of internal control is effective; and

1.1.2 Confirm that the 2022/23 opinion of the Corporate Manager – Internal Audit, based on his assessment of effectiveness, can be relied upon as a key source of evidence in the Annual Governance Statement.

10 JAC/23/05 ANNUAL COMPLAINTS MONITORING REPORT

10.1 The Chair invited the Deputy Monitoring Officer to introduce report

JAC/23/05.

10.2 Councillor Mariott questioned if compliments were logged under this policy. The Deputy Monitoring Officer responded that compliments did not fall under this report.

10.3 Councillor Whitehead questioned whether it was normal to have such different numbers of complaints across the two councils. The Deputy Monitoring Officer responded that where issues happen in a parish council multiple complaints can be made about the same incident. Additionally, the councils were working with SALC to get a mentoring support in place for parish clerks.

10.4 The Annual Complaints Monitoring Report was noted.

11 JAC/23/06 FORWARD PLAN

11.1 The forward plan was noted.

The business of the meeting was concluded at 13:38 pm.

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Chair

Agenda Item 7

BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

TO: Joint Audit and Standards Committee	REPORT NUMBER: JAC/23/08
FROM: The Returning Officer	DATE OF MEETINGS: 25 th September 2023
OFFICER: Arthur Charvonia, Chief Executive	KEY DECISION REF NO. N/A

REVIEW OF THE DELIVERY OF THE 2023 DISTRICT, TOWN & PARISH ELECTIONS

1. PURPOSE OF REPORT

- 1.1 Following a review of the delivery of the 2023 district, town, and parish elections. Council have requested that the Joint Audit and Standards Committee consider the draft action plan that has been formulated following those reviews and make any comments or observations on the actions within the plan. The draft action plan is attached at Appendix C.

2. OPTIONS CONSIDERED

- 2.1 There are no alternative options to consider. Council have requested that Joint Audit and Standards review the draft action plan.

3. RECOMMENDATION

- 3.1 To note the content of the draft action plan and consider any actions that may need to be taken following review of the plan.

REASON FOR DECISION

To ensure that improved procedures are in place ahead of the next scheduled elections and the further changes in electoral legislation.

4. KEY INFORMATION

- 4.1 As a result of a number of particular issues that arose during delivery of the 2023 district, town, and parish elections across Babergh and Mid Suffolk the Returning Officer commissioned the Chief Executive of the Association of Electoral Administrators (AEA) to conduct an external post-election review. The outcome of the review is attached at Appendix A.
- 4.2 After each election the Council's Electoral Services Team conduct an internal 'wash up' of the process in order to learn lessons and make improvements, as a result of the particular issues that arose delivering the 2023 election this process was expanded. The outcome of the broader review is attached at Appendix B.

The summary of the external review was that "despite the challenges, safe and secure elections were delivered. There were no inherent failings in the delivery of elections in Babergh and Mid Suffolk. However, there were clearly areas that required

improvement. The external and internal reviews that were conducted independently of each other identified that the following improvements need to be made to the following processes.

- Nominations and notices
- IT
- Communication with candidates & agents and internal engagement
- Corporate support
- Project planning
- Resource
- Team development
- Ongoing corporate learning
- Access to physical space

4.3 An action plan has been developed in response to the reviews. The action plan has been divided into three sections as recommended in the reviews,

- i) Lessons learned from the delivery of the district, town and parish elections which need to be captured, implemented, and embedded where possible now, in recognition that this particular set of elections and scale of nominations will not take place again until 2027.
- ii) Lessons learned and improvements that will relate to all types of elections but particularly ahead of the next scheduled elections – Police & Crime Commissioner (May 2024) and the General Election (before January 2025).
- iii) Implementation of the changes needed in response to the further changes in electoral law.

4.4 The Joint Audit & Standards Committee is asked to consider and comment on the draft action plan.

5. FINANCIAL & LEGAL IMPLICATIONS

5.1 There are no direct financial or legal implications arising from this report.

6. RISK MANAGEMENT

6.1 The draft action plan will include a review of the Election Project Team's risk register and Election Service's risk register.

7. CONSULTATIONS

7.1 The Returning Officer, the Electoral Commission and Corporate Election Project Team have been consulted.

8. EQUALITY ANALYSIS

There are likely to be equality impact implications arising from the action plan which will need to be assessed on an individual basis as they arise.

9. ENVIRONMENTAL IMPLICATIONS

9.1 There are no environmental impacts arising from the recommendations in this report.

10. APPENDICES

Title	Location
(A) Post-election review of Babergh and Mid Suffolk District Councils' Electoral Services – May 2023 - The Association of Electoral Administrators	Attached
(B) Elections Internal Review	Attached
(C) Action Plan	Attached

11. BACKGROUND DOCUMENTS

11.1 [Performance standards for Returning Officers | Electoral Commission](#)

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The Association of Electoral Administrators



Post-election review of Babergh and Mid Suffolk District Councils' Electoral Services – May 2023



Report compiled by:

Peter Stanyon
Claire Wardle

Chief Executive
Member Support and Training Officer

14 June 2023

1 Introduction

- 1.1 On 2 May 2023, the Chief Executive of Babergh and Mid Suffolk District Councils, Arthur Charvonja, approached the Association of Electoral Administrators (AEA) to commission a post-election review of the delivery of Electoral Services. He is the councils' Electoral Registration Officer (ERO) and Returning Officer (RO).
- 1.2 Mr Charvonja and the AEA's Chief Executive, Peter Stanyon, discussed the outline requirements on 3 May, following which the scope of the review was drafted. It was subsequently endorsed by Heather Bush, Regional Manager (Eastern Region) of the Electoral Commission (EC).

2 Scope of the review

- 2.1 The agreed scope was:
- 2.1.1 To investigate the circumstances surrounding the issues faced with the receipt and processing of nomination papers at the district, parish and town council elections on Thursday 4 May 2023.
 - 2.1.2 To evaluate the robustness of the delivery of Electoral Services in the two district councils, particularly in respect of the skills and knowledge of the core Electoral Services team and the support it receives corporately.
- 2.2 It was further agreed the following specific issues were to be considered:
- 2.2.1 The administration of the nominations processes at the district, parish and town council elections on Thursday 4 May 2023.
 - 2.2.2 The ERO and RO's and core Electoral Services team's awareness and understanding of existing legislation and guidance, and the challenges to be faced in the immediate future (Elections Act 2022, UK parliamentary general election, UK parliamentary constituency boundary changes, etc.).
 - 2.2.3 The core competencies of the Electoral Services team, particularly in respect of their skills and knowledge.

- 2.2.4 The corporate structures and processes in place to support the delivery of excellent Electoral Services, particularly in specialist areas such as IT, communications, and HR.

3 Review methodology

- 3.1 The review was led by Peter Stanyon, Chief Executive of the AEA. He has over 35 years' experience of delivering elections. He was supported by the Association's Member Support and Training Officer, Claire Wardle. She has around 25 years' experience.
- 3.2 It was agreed the review would be completed by the end of May 2023.
- 3.3 We reviewed the following documentation:
 - 3.3.1 Our pre-review questionnaire, which was completed by Edward McCreadie, the Corporate Manager – Electoral Services and Land Charges, on 12 May 2023.
 - 3.3.2 The project plan and risk register for the 4 May 2023 district, parish, and town council elections.
 - 3.3.3 The extended leadership team structure of the councils.
- 3.4 We interviewed 17 individuals recommended to us by the Chief Executive, including two election agents. Their names are listed at Appendix A.
- 3.5 We would like to place on record our thanks for the cooperative way all interviewees approached the review. All questions were answered openly and candidly, which greatly assisted our independent analysis.

4 Identified themes

- 4.1 We identified several common themes throughout the review and have therefore structured this report to address each. They are:
 - 4.1.1 Nominations and notices
 - 4.1.2 IT
 - 4.1.3 Communication with candidates and agents
 - 4.1.4 Corporate support
 - 4.1.5 Project planning
 - 4.1.6 Team development
 - 4.1.7 Ongoing corporate learning
 - 4.1.8 Other issues

4.2 We have avoided making specific recommendations in each area but have rather highlighted key issues and offered potential options for consideration.

5 Nominations and notices

5.1 Several issues were experienced in the administration of the nominations process.

5.2 Babergh has 24 district wards and 67 parishes, Mid Suffolk 26 district wards and 103 parishes. Of those, all district wards were contested as were nine of the parishes in Babergh and six in Mid Suffolk.

5.3 To assist with the administration of the process, the Notices of Election for the parishes were published on Thursday 16 March 2023, seven working days ahead of the latest statutory time for doing so. We consider this to have been a sensible decision.

5.4 The receipt of parish nominations commenced on Friday 17 March 2023. Candidates were able to submit their nominations to six locations across the districts at times specified by the RO. An online booking system was made available to candidates with RO staff attending and processing nominations onto the Electoral Management System (EMS). We consider these to be sensible arrangements, although we have reservations as to how they worked in practice.

5.5 The Notices of Election for the district elections were published on Thursday 23 March 2023, two working days ahead of the latest statutory time for doing so. The nominations process for the districts was administered entirely at Endeavour House, Ipswich.

5.6 Significant numbers of nominations were processed over the 13 working days for the parishes and eight working days for the districts (191 district nominations and over 1,340 parish).

5.7 We were made aware of several errors in the processing of nominations and the subsequent production and publication of the Statements of Persons Nominated, and in one case, the ballot papers. The errors included incorrect inputting of data, missing candidate details, incorrect candidate descriptions, errors in the inputting of relevant areas where candidates suppressed their home addresses, candidate details being transposed between district and parish notices, and incorrect voting instructions.

-
- 5.8 There was no single reason for the errors that occurred. Several factors were involved, including human error, lack of familiarity with legislation and software, and IT issues. We therefore suggest the following issues should be considered:
- 5.8.1 In-depth training of the staff appointed by the RO to input nominations into the EMS. It is essential they fully understand how the EMS input process works, how the data entry screens are arranged, and the precise data that needs to be entered. It is also essential those staff are aware of when the data must be saved.
 - 5.8.2 To help ensure information is entered completely and accurately, checklists should be provided and used when inputting all nominations into the EMS system.
 - 5.8.3 Every nomination should be physically date and time stamped on receipt so that evidence is available should it be required (as was the case in one incident at this election). Too much reliance was given to the EMS recording that information.
 - 5.8.4 It was reported the EMS processing time was slow and contributed towards some of the inputting errors that transpired. This issue should be taken up with the EMS supplier to seek a solution, with the technical support of the Corporate IT team.
 - 5.8.5 Data inputting should be checked for accuracy on an ongoing daily basis. This will help with identifying common errors or issues of concern, and with the timely production of the various notices required following the close of nominations.
 - 5.8.6 In all instances, data should be checked by reference to the source documentation, for example the physical nomination paper. Ideally, it should be done by individuals not involved in the inputting process, by reference to checklists developed for the specific tasks, for example the checking of ballot papers should include specifically checking the number of candidates for whom electors may vote.
 - 5.8.7 The system for the filing of the physical nomination papers must be organised, clear and simple. It is essential the papers can be found easily so that the checking and validation processes can proceed efficiently. Consideration could be given to sub-dividing the filing system into the two

sovereign district areas, sub-dividing again into parishes within those areas, and then delegating responsibility for the four areas to individual officers.

6 IT

- 6.1 The councils have contracted Democracy Counts to provide the EMS used for the delivery of Electoral Services. These were the first all-out district and parish elections held using the system. It was successfully used at the combined Suffolk County Council and Police and Crime Commissioner (PCC) elections in 2021.
- 6.2 It is clear there were issues with aspects of the software, which contributed to the challenges faced with the processing of nominations and production of subsequent notices. Ghosting of data was experienced, as was the ability to save invalid nominations (introducing confusion) and the incorrect formatting of exports.
- 6.3 Democracy Counts has identified a bug in the system, which may have been unique to Babergh and Mid Suffolk. We were advised steps are in hand for it to be corrected.
- 6.4 A lack of confidence in the system was expressed by several interviewees, but it is also clear the EMS cannot be held responsible for every issue that transpired.
- 6.5 We make the following suggestions:
 - 6.5.1 With the support of the corporate IT team, discussions should be had with Democracy Counts in respect of the individual issues faced at these elections. It is essential the users of the system have confidence in its operation.
 - 6.5.2 Every user of the system should receive the necessary training in its operation in respect of their areas of responsibility. We formed the view that some of the issues experienced may have been because of lack of understanding of the processes to be followed within the system.
 - 6.5.3 At future elections, the system should be set up and tested much earlier than was the case on this occasion. We recognise there may have been issues preventing an earlier set up at these elections, but that contributed to the challenges faced. The corporate IT team should be fully involved in assisting where necessary.

- 6.5.4 The method for the reporting and escalation of issues, primarily to Democracy Counts, should be reviewed by the Electoral Services and corporate IT teams to improve effectiveness and resolution time.
- 6.5.5 There is an opportunity at the casual vacancy elections in June to set up the election and use the system in less pressurised and overwhelming circumstances. This could enable procedures to be learned and recorded more effectively. Any issues can be reported and resolved with the software company to the benefit of future elections.

7 Communication with candidates and agents

- 7.1 There was no communications plan in place for this set of elections. The EC emphasise it is part of the RO's role to ensure that everyone who wants to participate in elections (including electors and candidates) can access clear information to enable them to do so. Early engagement with candidates and agents is recommended.
- 7.2 There were two briefings for candidates and agents – one before and one after the close of nominations. We consider this sensible. However, we were informed by an agent that the meetings were quite brief and given at short notice, so not everyone who would have benefited was able to attend. It was felt there was insufficient information provided about the parish council election process.
- 7.3 Candidates and agents were not given direct contact details for the Electoral Services Manager (ESM) or core team. They were required to use a generic switchboard number. We were told it was difficult to get through to members of the core team. Those who were existing councillors had the ESM's contact details, and responses to phone calls were considered helpful. However, there was a slow response to emails sent to the team.
- 7.4 Because of the large number of nominations being processed, appointments taking longer than expected, and the emerging issues, the nomination process did not appear to be under control. One agent told us he had raised concerns about insufficient staff dealing with the nominations.
- 7.5 When issues were found with some Statements of Persons Nominated, not all the agents were informed. If information was given in a more proactive and transparent way, this could have helped reassure candidates and agents issues were being worked out and that subsequent election materials would be accurate.

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- 7.6 Although no issues were reported in respect of the count process, there were gaps in the information provided at the verification and counting of the votes. For example, verification statements were not made available for inspection as they should be and have been in the past. Candidates and agents also found it difficult to ask questions, as it was not clear who to ask apart from the ESM or RO, who were actively engaged in the count.
- 7.7 Concerns have been raised about the Declarations of Result, which show very large numbers of ballot papers “rejected in part”. We understand these are in fact unused votes, not rejected votes.
- 7.8 Some voters do not use all the votes they are entitled to use. Unused votes should not be categorised as rejected but should still be recorded at the count to provide a clear audit trail and help reconcile the verification and count figures.
- 7.9 The fact the unused votes have been incorrectly categorised has no bearing on the accuracy of the result. However, we understand some people may have been confused by the way the results have been presented, introducing doubt as to their accuracy.
- 7.10 We therefore recommend the following issues should be considered:
- 7.10.1 The development of a communications plan for future elections, detailing how candidates and agents will be given information before, during and after elections. This should be part of a wider public awareness plan to encourage participation.
 - 7.10.2 Identifying methods of communication to reach and inform as many candidates as possible, bearing in mind the geographical area of the two districts.
 - 7.10.3 A strategy for communicating clear information in the event of issues or errors, aiming to be proactive and transparent, and setting the narrative, should be developed.
 - 7.10.4 Identifying staff during the election process, and at the count, as points of contact for candidates and agents. Clear lines and examples of answers for common questions should be provided.
 - 7.10.5 The Declarations of Result for the contested parishes should be re-published so that unused votes are not incorrectly classified as “rejected in part”, but as unused votes.
-

8 Corporate support

- 8.1 The Electoral Services team sits within the Law and Governance directorate, with the Director having line management responsibility for the ESM. The ESM is a Corporate Manager, and also manages Local Land Charges. Both the Director and the ESM are designated Deputy ROs with full powers at elections. The Deputy Chief Executive is also a Deputy RO with full powers.
- 8.2 There is a good history of corporate support for elections, with services across the councils being identified as having relevant skills and resources to assist. These include staff in Democratic Services, Land Charges, corporate IT, Communications and Customer Services. It is important that the experience within the councils is tapped into and built on at future elections.
- 8.3 There is a continued corporate willingness to support the delivery of elections. When the problems with the nomination process were identified, there was a clear, evident and swift mobilisation of resources to assist. The RO and DROs took a hands-on approach to resolving issues, and twice daily meetings took place in the last four weeks of the election timetable.
- 8.4 We received differing recollections as to the availability of additional support prior to then, and the readiness of colleagues to assist.
- 8.5 We believe the ESM could have been clearer as to what support the team needed whereas the project team could have been more challenging in its oversight of the delivery of the project. That in turn would likely have led to an escalation of the potential requirements to the senior leadership team, from where appropriate support could be channelled.
- 8.6 In short, greater understanding of the level and types of support that could have been requested and could then have been granted was not communicated as effectively as it might have been.
- 8.7 While acknowledging that all-out district and parish elections are the most technically difficult to administer, there will be other issues and challenges in future.
- 8.8 The assistance from a previous member of the Electoral Services team was extremely valuable. Her local knowledge, for example around the structure of the register and the arrangements for the count, was particularly useful. Such knowledge needs to be absorbed and built on by the existing team.

8.9 We therefore recommend the following issues should be considered:

- 8.9.1 A thorough review of the challenges faced by the Electoral Services team in the delivery of these elections, identifying what resources and support will be required to mitigate risk in future.
- 8.9.2 Recognition of the forthcoming challenges in implementing Phase 2 of the Elections Act 2022 measures, implementing parliamentary boundary changes, preparing for the UK parliamentary general election (at potentially 25 working days' notice), and preparing for the scheduled PCC polls in 2024 and Suffolk County Council polls in 2025.
- 8.9.3 Questioning which aspects of the election process could be delivered by staff other than the core Electoral Services team. For example, recruitment of polling station staff, handling elector enquiries, proof-checking election materials, preparing ballot boxes and stationery, etc.
- 8.9.4 Recognising that elections are much bigger than the business-as-usual processes of the Electoral Services team, and engendering a "one council" approach to their delivery and success within the extended leadership team.
- 8.9.5 Recognising that examples of positive support and collaboration exist and building on existing experience and expertise at future elections.

9 **Project planning**

- 9.1 As with previous elections, there was a project team with representatives from Communications, Customer Services, ICT, as well as the RO and his Deputies.
- 9.2 There was a high-level project plan, based on the EC's template. This plan was monitored at project board meetings.
- 9.3 With hindsight, it is apparent that members of the project team felt there was insufficient check and challenge of the delivery of the plan. They were assured that things were going to plan and took that at face value.
- 9.4 The project plan contains broad deliverables, but without supporting detail of how long certain elements take or the interdependency of different tasks.

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- 9.5 There was no detailed operational plan underneath the high-level plan. This meant there was a reliance on the ESM's experience and knowledge of how to do things, making it difficult for others to lead on tasks.
- 9.6 There is no electoral registration plan, which is one of the performance standards inputs expected by the EC. Such a plan should be in place for delivering the statutory annual canvass for the register of electors. Registration activity should also be undertaken throughout the year to maintain the register and to try to avoid peaks in applications before an election.
- 9.7 We therefore recommend the following issues should be considered:
- 9.7.1 Encouraging and valuing the input of the core Electoral Services team and supporting services in the development of election and registration plans.
- 9.7.2 To support the high-level project plan, and with the input of the core Electoral Services team and other supporting services, a more detailed delivery plan for future elections should be drafted that identifies key tasks at a more granular level.
- 9.7.3 Ensure project team meetings continue to take place well in advance of scheduled elections, recognising that planning starts with the review of the previous election, and that they provide an opportunity to check and monitor progress effectively.
- 9.7.4 Consider having the oversight of the project plan managed by someone other than the ESM.
- 9.7.5 The development of operational plans, process notes and checklists for all aspects of the delivery of an election, including (but not limited to):
- Setting up an election in the EMS
 - Booking and equipping polling stations
 - Recruiting and training staff
 - Processing nominations
 - Producing notices and election materials
 - Operation of postal vote opening
 - Ballot box preparation
 - Management of the count

9.7.6 Development of an electoral registration plan covering the timescales, tasks and deliverables for the annual canvass as well as plans for identifying new potential electors and maintaining the register throughout the year.

9.7.7 Seeking out good practice from other authorities.

10 Team Development

10.1 The Electoral Services team comprises the ESM and two full time and two part time Administrative and Technical Support Officers. It is a flat structure, with no Deputy ESM or other senior/supervisory staff in the team. The lack of a Deputy ESM is considered a weakness.

10.2 It is a new team. We must note three members of the core team left in quick succession in 2021/2022, as did an experienced and highly knowledgeable Director. This led to an unsettled experience.

10.3 It is clear there are many strengths and an enthusiasm to deliver quality services, but it is also clear the technical knowledge necessary to administer quality electoral services requires development. That will take time.

10.4 There is however no development plan for the team. All have completed the AEA Foundation Course in Electoral Services, but there is no current programme for further development or training.

10.5 We are conscious the issues that arose at these elections have left the team feeling insecure and anxious. Strong leadership will be required to help rebuild confidence and ensure preparedness for the delivery of future elections.

10.6 We therefore recommend the following issues should be considered:

10.6.1 Engendering a collaborative and team spirit culture, undertaking work to build the core team, developing the individual and collective strengths that are apparent and addressing those areas where issues prevent optimum team working.

10.6.2 Seeking out development opportunities to build the core technical skills, including attending elections training courses, software training, shadowing other electoral services teams, etc.

10.6.3 Involving the team in the development of operational plans and process notes (see also the project planning section).

- 10.6.4 Having regular opportunities to share knowledge, new processes and guidance at team meetings, etc.
- 10.6.5 Encouraging individual team members to visit other local authorities to help understand how best to develop processes that will be of benefit to the electors of Babergh and Mid Suffolk.
- 10.6.6 Benchmarking with other local authorities to test if the structure remains appropriate, and to build on good practice already developed elsewhere.

11 Ongoing corporate learning

- 11.1 The delivery of electoral services has experienced significant and ongoing change over the last 20 years. That has introduced challenges for all local authorities. Electoral services teams are no longer able to deliver elections independently – a corporate approach is both recommended and required.
- 11.2 It was clear the introduction of voter ID was managed well in Babergh and Mid Suffolk, albeit we believe focus on its safe delivery may have contributed to the issues experienced in these elections. Some of the core elements of election delivery, including team development, appear to have suffered.
- 11.3 It was also clear there is very little awareness corporately of the challenges to come over the next few years.
- 11.4 We therefore recommend the following for consideration:
 - 11.4.1 A corporate project team be established to consider:
 - The impact the phase one Elections Act 2022 measures (voter ID and accessibility) will have on future elections and referendums.
 - The impact the phase two measures (including online absent voting, the handling of postal ballot papers, EU citizens candidacy and voting rights and the changes to the overseas electors' franchise) are likely to have.
 - Early planning for the PCC (due May 2024), the UK Parliamentary general election (due before the end of January 2025), and Suffolk County Council elections (due May 2025).

- The impact of the changes to the parliamentary constituency boundaries that will be reported to Parliament by 1 July 2023.

11.4.2 As a minimum, the ERO/RO, ESM and core Electoral Services team be encouraged to attend training and development on the Elections Act changes as they arise, and to share that knowledge with the extended leadership team and elected members of both councils.

12 Other issues

12.1 One other issue that became apparent was pressure on physical office and preparation space. The delivery of elections is a large exercise, with significant amounts of paper and equipment involved.

12.2 We appreciate the reasons why the footprint available is limited, but we also consider the lack of space a significant risk in the delivery of technically challenging elections such as those in 2023, but also those such as the forthcoming UK parliamentary general election that will generate higher levels of public interest.

12.2.1 We consider careful consideration should be given to attempting to resolve or mitigate the space challenge ahead of the PCC elections in May 2024.

13 Summary

- 13.1 It is clear significant challenges were faced by Babergh and Mid Suffolk in the delivery of the elections on 4 May 2023. Mistakes were made, but it is apparent they were resolved as efficiently and effectively as was possible in the circumstances. It is also fair to say there were many mitigating issues that are unlikely to arise again.
- 13.2 We are content that despite the challenges, safe and secure elections were delivered. This was largely due to the commitment, enthusiasm and dedication shown by all those involved.
- 13.3 We have recommended several matters for consideration by the ERO/RO and the wider team. Although set out in the commentary, for ease of reference, they are summarised at Appendix B.
- 13.4 We are satisfied there are no inherent failings in the delivery of elections in Babergh and Mid Suffolk. There are clearly areas that require improvement, but we have not identified any need for an entire re-design of the service.

Peter Stanyon
Chief Executive

Claire Wardle
Member Support and Training Officer

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Interviewees

Edward McCreadie	Corporate Manager – Electoral Services and Land Charges
Joshua Edwards	Administrative and Technical Support Officer
Katie Edwards	Administrative and Technical Support Officer
Sally Jepson	Administrative and Technical Support Officer
Michelle Hart	Administrative and Technical Support Officer
Donna Bridges	Electoral Services Team Member (Retired)
Janice Robinson	Corporate Manager –Governance and Civic Office
Patrick Richardson-Todd	Governance Support Officer
Kathy Nixon	Deputy Chief Executive
Sara Wilcock	Director – Customers, Digital Transformation and Improvement
Brad Jones	Corporate Manager – Communications and Engagement
Matthew Harding	Corporate Manager – ICT and Programme Management
Samantha Lake	Corporate Manager – Customer Operations
Philip Faircloth-Mutton	Councillor and Election Agent (Conservative Party)
Ifty Ali	Director – Law and Governance (Interim)
Nicholas Hardingham	Councillor and Election Agent (Green Party)
Arthur Charvonja	Chief Executive and Electoral Registration and Returning Officer

Summary of suggested improvements

Nominations and notices

- 1 In-depth training of the staff appointed by the RO to input nominations into the EMS should be undertaken.
- 2 Checklists should be provided and used when inputting all nominations into the EMS system, to help ensure information is entered completely and accurately.
- 3 Every nomination should be physically date and time stamped on receipt so that evidence is available should it be required.
- 4 The issue of EMS processing time being reported as slow should be taken up with the EMS supplier to seek a solution, with the technical support of the Corporate IT team.
- 5 Data inputting should be checked for accuracy on an ongoing daily basis.
- 6 In all instances, data should be checked by reference to the source documentation. Ideally, it should be done by individuals not involved in the inputting process, by reference to checklists developed for the specific tasks.
- 7 The system for the filing of the physical nomination papers must be organised, clear and simple.

IT

- 8 With the support of the corporate IT team, discussions should be had with Democracy Counts in respect of the individual issues faced at these elections.
- 9 Every user of the system should receive the necessary training in its operation in respect of their areas of responsibility.
- 10 At future elections, the system should be set up and tested much earlier than was the case on this occasion. The corporate IT team should be fully involved in assisting where necessary.
- 11 The method for the reporting and escalation of issues, primarily to Democracy Counts, should be reviewed by the Electoral Services and corporate IT teams to improve effectiveness and resolution time.

- 12 There is an opportunity at the casual vacancy elections in June to set up the election and use the system in less pressurised and overwhelming circumstances.

Communication with candidates and agents

- 13 A communications plan should be developed for future elections, detailing how candidates and agents will be given information before, during and after elections. This should be part of a wider public awareness plan to encourage participation.
- 14 Methods of communication should be developed to reach and inform as many candidates as possible, bearing in mind the geographical area of the two districts.
- 15 A strategy for communicating clear information in the event of issues or errors should be developed.
- 16 Clear points of contact for candidates and agents should be identified, with clear lines and examples of answers for common questions provided to them.
- 17 The declarations of result for the contested parishes should be republished so that unused votes are not classified as "rejected in part", but as unused votes.

Corporate support

- 18 A thorough review of the challenges faced by the Electoral Services team in the delivery of these elections, identifying what resources and support will be required to mitigate risk in future, should be undertaken.
- 19 The extended leadership team needs to recognise the forthcoming challenges in implementing Phase 2 of the Elections Act 2022 measures, implementing parliamentary boundary changes, preparing for the UK Parliamentary general election and the scheduled PCC polls in 2024 and Suffolk County Council polls in 2025.
- 20 Questioning which aspects of the election process could be delivered by staff other than the core Electoral Services team.
- 21 Engendering a "one council" approach to the delivery of elections within the extended leadership team.
- 22 Recognising that examples of positive support and collaboration exist and building on existing experience and expertise at future elections.
-

Project planning

- 23 Encouraging and valuing the input of the core Electoral Services team and supporting services in the development of election and registration plans.
- 24 A more detailed delivery plan for future elections should be drafted that identifies key tasks at a more granular level.
- 25 Ensure project team meetings continue to take place well in advance of scheduled elections, and that they provide an opportunity to check and monitor progress effectively.
- 26 Consider having the oversight of the project plan managed by someone other than the ESM.
- 27 Develop operational plans, process notes and checklists for all aspects of the delivery of an election.
- 28 Develop of an electoral registration plan covering the timescales, tasks and deliverables for the annual canvass as well as plans for identifying new potential electors and maintaining the register throughout the year.
- 29 Seek out good practice from other authorities.

Team development

- 30 Engender a collaborative and team spirit culture, undertaking work to build the core team, developing the individual and collective strengths that are apparent and addressing those areas where issues prevent optimum team working.
- 31 Seek out development opportunities, including elections training courses, software training, shadowing other ES teams, to build the core technical skills.
- 32 Involve the team in the development of operational plans and process notes.
- 33 Have regular opportunities to share knowledge, new processes and guidance at team meetings etc.
- 34 Encourage individual team members to visit other local authorities to help understand how best to develop processes that will be of benefit to the electors of Babergh and Mid Suffolk.

- 35 Benchmark with other local authorities to test if the structure remains appropriate, and to build on good practice already developed elsewhere.

Ongoing corporate learning

- 36 A corporate project team be established to consider the ongoing impact the phase one Elections Act 2022 measures, the impact the phase two measures are likely to have, undertake early planning for the PCC and UK Parliamentary general elections, and the impact of the changes to the parliamentary constituency boundaries.
- 37 The ERO/RO, ESM and core Electoral Services team should be encouraged to attend training and development on the Elections Act changes as they arise, and to share that knowledge with the extended leadership team and elected members of both councils.

Other issues

- 38 Careful consideration should be given to attempting to resolve or mitigate the space challenge ahead of the PCC elections in May 2024.



The Association of Electoral Administrators

Founded in 1987, the Association of Electoral Administrators (AEA) is the professional body representing the interests of electoral administrators in the United Kingdom, working independently of government. Key objectives include fostering the advancement of consistent and efficient administration of electoral processes, raising the profile of electoral administrators and contributing positively to electoral reform.

With 2,000 members, the majority of whom are employed by local authorities to provide electoral registration and election services, the AEA is uniquely placed to comment on the challenges faced by electoral administrators in delivering safe and secure electoral processes to UK citizens.

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Elections Internal Review (Appendix B)

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Introduction

The purpose of this report is to summarise the feedback received from colleagues involved in the organisation and running of the local District and Parish Elections held on Thursday 4 May 2023. A total of 4 workshops were facilitated by Will Knights (Customer Insight and Intelligence Officer), Olivia Wicker (Process Improvement Officer), Sharna Baldwin (Digital Project Support Officer) and Gary Allen (Assistant Manager – Customer Operations) during May and June 2023. During the sessions, colleagues were encouraged to share their open and honest feedback about their experience working in the 2023 elections.

Workshop sessions were arranged for the following groups:

- Presiding officers
- Colleagues involved in nominations
- Parish Clerks
- Elections Team
- Customer services team
- Polling inspector written feedback was also captured.

Across all workshops, 20 different members of staff gave their feedback about the elections. Officers were also asked to provide their feedback via a short survey created using Microsoft Forms. This survey was also circulated to a wider audience in order to capture the opinions of those who could not attend the workshops or had further thoughts to add after their sessions. A further 87 responses were received via this survey. Feedback was also received via email in some instances.

Complaints data for the period 1 February 2023 to 31 May 2023 was reviewed by our Customer Liaison Officer, who shared details of one relevant complaint. An additional complaint was received by Electoral Services via the BMSDC Contact Us form on the website. We analysed a total of 50 calls which were received by Customer Services related to the elections on 4th May.

This internal review has been carried out using the [Performance Standards for Returning Officers](#), published by the Electoral Commission in December 2022, as a benchmark for success. The particular areas for concern, highlighted from this review, are shown in red.

Outcome 1: Electoral services are robust and support the delivery of well-run elections

The Electoral Commission advise that meeting the following criteria demonstrates achievement of Outcome 1:

- Events are delivered in accordance with legislation.
- Elections delivered without legal challenge to the administration of the poll.
- **Analysis of team resilience, capability, and capacity.**
- Analysis of feedback on the delivery of polls and any complaints received.

- **Performance against measures and objectives set out in your project plans.**

Outcome 2: Everybody who is eligible and wants to vote is able to do so and has confidence in the voting process

The Electoral Commission advise that meeting the following criteria demonstrates achievement of Outcome 2:

- Evaluation of public awareness activities.
- Analysis of feedback and complaints from eligible, staff, candidates, and agents.
- Analysis of available data relating to voters who have not been able to cast their vote (for example, due to not having appropriate Identification (at relevant polls)).
- No voters are prevented from casting their vote due to inaccessibility of polling station arrangements.

Outcome 3: Everybody who is eligible and wants to stand for election is able to do so and has confidence in the process

The Electoral Commission advise that meeting the following criteria demonstrates achievement of Outcome 3:

- **No errors on the statement of persons nominated or ballot papers**
- **Analysis of feedback and complaints from candidates, agents, and other observers.**

Outcome 4: Everyone can have confidence that the election process is well managed and in the accuracy of the results

The Electoral Commission advise that meeting the following criteria demonstrates achievement of Outcome 4:

- Elections delivered without legal challenge to the administration of the poll.
- **Analysis of feedback and complaints from candidates, agents, and other observers.**
- Election results are accurate and readily available.
- Analysis of police data relating to allegations of electoral fraud/integrity issues.

Summary and recommendations

Based on the feedback received during this review of the 2023 elections, we can identify many areas of good practice. For example, interviewees and survey respondents spoke positively regarding the staff working the elections, with praise towards the collaboration, teamwork, and attitude of those involved. Presiding Officers gave largely positive feedback to the ballot box pick up from Endeavour House, and some of the aspects of the online training. Parish Clerks fed back that those working at the polling stations were organised and demonstrated experience. Positive feedback was also received regarding the implementation of the new voter ID legislation and reported very little disruption to the running of the election as a result of the new requirements. The customer services team praised the Elector8lite system and the FAQs they were provided to help resolve customer calls.

However, there are lessons to be learned from this year's election experience. Upon review of the responses received during our workshops and the survey, we have organised the feedback into key themes: communication, planning and organisation, knowledge and experience, training, and system issues. Key areas for improvement in each of these themes are outlined below, and it is our recommendation that an action plan be put in place to ensure these areas are addressed for the next election period.

Communication

Communication was noted by most of the groups contacted as an area for improvement. It was highlighted that because an election team plan was not provided to the Elections Team, deadlines and responsibilities were not communicated to those involved in nominations. As well as this, colleagues at the count were not given safety information or a structure of the day. There was also criticism of the communication during the delivery of ballot boxes to Wherstead park, and during the count process itself. This lack of communication caused delays in hitting election milestones, and left staff feeling stressed and confused.

Some clerks also criticised the level of communication they received from the elections team, especially around the mistakes in the first publication in nominations. An improved communications plan and engagement with stakeholders is recommended to ensure key individuals are kept updated and informed. The communication plan, in addition to a robust and comprehensive election delivery plan, will ensure that all staff understand their roles and responsibilities, as well as key milestones and requirements for the election delivery.

Planning and organisation

Improvements to the planning of the election was also suggested as an area for improvement. For example, staff involved in the nominations process expressed that the lack of notice they were given for where they needed to work negatively impacted on their other duties. The forward planning of the nominations process was criticised, and it is suggested that a work plan and test for the process is prepared

well in advance to ensure staff are confident in the process, and that potential system issues can be spotted beforehand.

Presiding officers fed back that on election day their boxes did not always contain all the relevant materials, and the instructions and paperwork were confusing and in some cases contradictory. It is recommended that more time is spent in advance to ensure all materials for presiding officers on the day is clear and consistent, and that officers have everything they need to effectively perform their duties.

Colleagues involved in the verification and count expressed that the process felt at times disorganised, and this led to staff working long hours and a perceived delay in the announcement of the results. Improved communication of the plan and coordination of staff during this process would have increased its efficiency.

It was highlighted in multiple workshop sessions that the planning of the elections should begin well in advance of the election date. It is recommended that doing a test election in advance would be a useful way to try out delivery plans, spot errors, identify risks and ensure preparedness for the real election.

Creating a comprehensive project plan for the elections team to work from that is clear and accessible is also recommended, to ensure that every member of the team knows what needs to be done, when deadlines are, and who is responsible for delivery.

Knowledge and experience

A key concern raised by the Elections Team was regarding the inexperience of the current team. They did not feel they had received adequate training and support from management during the elections process and had to instead rely on an experienced external member of elections staff for help and advice. They argued that too much responsibility fell to a part time member of the team to coordinate the training process.

In order to prevent the same issues repeating in future elections, the Elections Team highlighted a requirement for more training for the team to address the current skills gaps. This would help give members of the team greater confidence in the delivery of future elections, as they expressed concerns that they would otherwise need to rely on external support again in the future.

It must also be noted that there were a large number of first-time presiding officers and inspectors during this election, and more support or specific training may have been helpful for these individuals. There were instances of experienced officers leading relatively small polling stations, whilst inexperienced officers managed busier ones. Better coordination of experienced officers to key areas may improve efficiency on the day.

Training

The need for more training was expressed by the Elections Team and colleagues involved in nominations. In addition, presiding officers felt the training they received could be improved in order to better prepare them for election day. There were many

recommendations for improvements to training provided by those involved in the elections, including:

- Running a test election in advance to train officers and identify any risk areas.
- Having in person training sessions in addition to the online training for presiding officers.
- Allowing the opportunity to ask questions.
- Greater focus on completion of necessary forms.
- Delivering training further in advance.
- Including information regarding requirements for specific polling stations, where applicable.

Whilst there was positive feedback about the online training, many felt having some face-to-face training would also have been beneficial, especially for new presiding officers, to enable them to clarify and ask questions of the elections team, particularly with the new voter ID requirements which many officers were worried about before the election. Some also fed back access to the online training should have been given earlier to enable more time to complete the training and ask questions before the election.

System Issues

The nominations group showed frustration with the elections software, as well as the system used for appointments. They stated that the elections software caused errors and delays in the process, as the team had to complete manual checking of the inputted information once it was saved. Mistakes in the initial publication of nominations, and postal ballot papers in one parish ward can be partly attributed to issues with the system. These mistakes caused reputational damage and required large amounts of officer time to resolve, involving officers outside of the elections team. It was also suggested that more IT equipment (such as laptops) would make the process more time efficient. It would be beneficial to complete a review of the current system and escalate concerns to the system supplier ahead of the next election in order to reduce this risk.

Feedback from the nominations group suggested that the appointments system needs refinements in order to achieve its full benefits. For example, eliminating the possibility of booking multiple appointments in the same timeslot, and allowing for greater flexibility in the duration of appointments. Improving the appointment system for nominations with these refinements is recommended to ensure the nominations process runs more smoothly in the future.

Next Steps and Action Plan

Based upon our summary and recommendations, we propose that a comprehensive action plan is developed over July so that lessons are learned, and appropriate steps are taken to ensure the continuous improvement of electoral services.

This action plan should be created with and owned by the Elections Team, alongside the wider corporate body, with clear commitments and responsibilities for its implementation. We propose the following actions should be included within it:

Project Management and Process Mapping

We need to ensure effective project management, and that key elections processes are run effectively.

- Draft a comprehensive and robust elections team plan with key milestones, actions, dates, and responsibilities that can be used by the Elections and wider project team. Ensure it is drafted well ahead of the next election so it may be refined iteratively.
- Map the changes in elections legislation to ensure that we are fully prepared for the next election and have appropriate communication and support in relation to this.
- Process map the key election processes (e.g. nominations process, postal vote processing) to ensure that the Elections team and related teams understand the processes, steps and what needs to be done at each stage.
- Plan and conduct a 'test' election well before the next election period, to ensure business continuity and that processes and plans are robust.
- Create a comprehensive risk register, capturing all potential risks and issues faced, ensuring they have all been properly documented and that appropriate mitigations have been identified and implemented as a tool to proactively manage the project.

Communications and Engagement

- Create a comprehensive communications plan that spans the lifecycle of the elections process to provide a view of ongoing activities to help with the smooth running of future elections. Ensure that communications are informative and consistent and are given to appropriate stakeholders at the right time.
- Review key stakeholder groups, both internal and external, and ensure that all stakeholders are captured within the communications plan.
- Communications should be sent after this election review to those who worked in the latest local elections, thanking them for their feedback and hard work. This is to ensure recognition of efforts and that an appropriate number of staff will volunteer again to work in the next election period.
- Communication of this review (together with the external review commissioned from the AEA) and the actions being taken, should be sent to all key stakeholders.

Resource

- Complete a polling station review to ensure that all venues chosen are appropriate in terms of accessibility. Work with our partner groups, such as the Disability Forum and the Shaw Trust, who could support with this. This will help us to ensure venues are appropriate and we are aware of any additional resources that may be required (e.g. lighting, coins for meters or poor phone signal).
- Work with existing Presiding Officers to create short information packs for each polling station to help Presiding Officers set up, and to provide key information that may need to be known about each location.
- Review staff numbers required for each election process (e.g. nominations, count) and ensure a robust recruitment plan is drafted ahead of the election period.
- Ensure appropriate allocation of staff to each polling station; try to ensure more experienced staff are assigned to larger or busier stations, and that the number of poll staff is appropriate for each location.

Training and Development

- Review the online training available to staff ahead of the elections to ensure that any additional training materials can be planned out and documented.
- Create a training plan ahead of the next election, explore the possibility to add in-person or specific training to first-time presiding officers, poll clerks, count supervisors or those who may need additional support.
- Create a training and development plan to support the ongoing development of the Elections team, perhaps with the offer of external mentors and support to share best practice.
- Training and development of all support staff including Customer Operations to ensure that more demand can be resolved at the first point of contact.

IT

- Review the issues experienced with the elections system and ensure these are raised and resolved ahead of the next election.
- Create a training plan for those that need to utilise the system to ensure appropriate levels of skill and confidence.
- Using feedback from those involved with nominations, look to improve upon the appointment booking system to ensure that it works as well as possible for the team.

Elections Review Action Plan

Recommendation	Start Date	Progress	Status
Lessons learned from the delivery of the district, town and parish elections which need to be captured, implemented and embedded where possible now, in recognition that this particular set of elections and scale of nominations will not take place again until 2027.			
We need to ensure effective project management, and that key elections processes are run effectively.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Draft a comprehensive and robust elections team plan with key milestones, actions, dates, and responsibilities that can be used by the Elections and wider project team. Ensure it is drafted well ahead of the next election so it may be refined iteratively.	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing
Map the changes in elections legislation to ensure that we are fully prepared for the next election and have appropriate communication and support in relation to this.	Commenced	Key officers attending training on new legislation, key dates and milestones to be incorporated into election plan	Ongoing
Process map the key election processes (e.g. nominations process, postal vote processing) to ensure that the Elections team and related teams understand the processes, steps and what needs to be done at each stage.	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing
Plan and conduct a 'test' election well before the next election period, to ensure business continuity and that processes and plans are robust.	Commenced	Training being undertaken with democracy counts to have test plan up and tested before end of December	Ongoing
Create a comprehensive risk register, capturing all potential risks and issues faced, ensuring they have all been properly documented and that appropriate mitigations have been identified and implemented as a tool to proactively manage the project.	Commenced	Current risk register being reviewed	Ongoing
Create a comprehensive communications plan that spans the lifecycle of the elections process to provide a view of ongoing activities to help with the smooth running of future elections. Ensure that communications are informative and consistent and are given to appropriate stakeholders at the right time.	Not started		Not Started
Review key stakeholder groups, both internal and external, and ensure that all stakeholders are captured within the communications plan.	Commenced	Discussion with County Joint Emergency Planning Unit representative to join the CEPT	Not Started
Communications should be sent after this election review to those who worked in the latest local elections, thanking them for their feedback and hard work. This is to ensure recognition of efforts and that an appropriate number of staff will volunteer again to work in the next election period.	Completed	Staff contacted and thanked and requested to indicate if they wanted to work at the next election	Completed
Communication of this review (together with the external review commissioned from the AEA) and the actions being taken, should be sent to all key stakeholders.	Commenced	Regular communication with Eastern Electoral Commissioner and AEA member support	Ongoing
Complete a polling station review to ensure that all venues chosen are appropriate in terms of accessibility. Work with our partner groups, such as the Disability Forum and the Shaw Trust, who could support with this. This will help us to ensure venues are appropriate and we are aware of any additional resources that may be required (e.g. lighting, coins for meters or poor phone signal).	Not started	Polling District Review needs to be started before December 2023	Not Started
Work with existing Presiding Officers to create short information packs for each polling station to help Presiding Officers set up, and to provide key information that may need to be known about each location.	Not started		Not Started
Review staff numbers required for each election process (e.g. nominations, count) and ensure a robust recruitment plan is drafted ahead of the election period.	Not started		Not Started
Ensure appropriate allocation of staff to each polling station; try to ensure more experienced staff are assigned to larger or busier stations, and that the number of poll staff is appropriate for each location.	Not started		Not Started

Review the online training available to staff ahead of the elections to ensure that any additional training materials can be planned out and documented.	Not started		Not Started
Create a training plan ahead of the next election, explore the possibility to add in-person or specific training to first-time presiding officers, poll clerks, count supervisors or those who may need additional support.	Not started		Not Started
Create a training and development plan to support the ongoing development of the Elections team, perhaps with the offer of external mentors and support to share best practice.	Commenced	Training has been undertaken with democracy counts and AEA. Team have visited ESDC and will attend User Group. Further ongoing training is planned	Ongoing
Training and development of all support staff including Customer Operations to ensure that more demand can be resolved at the first point of contact.	Commenced	Initial meeting held with Assistant Manager for Customers for help from the Team	Ongoing
Review the issues experienced with the elections system and ensure these are raised and resolved ahead of the next election.	Commenced	Regular fortnightly meetings have been set up with democracy counts to review issues with system. Client meetings have also been set up	Ongoing
Create a training plan for those that need to utilise the system to ensure appropriate levels of skill and confidence.	Commenced	Training has been undertaken with democracy counts and AEA. Team have visited ESDC and will attend User Group. Further ongoing training is planned	Ongoing
Using feedback from those involved with nominations, look to improve upon the appointment booking system to ensure that it works as well as possible for the team.	Not started		Not Started
In-depth training of the staff appointed by the RO to input nominations into the EMS. It is essential they fully understand how the EMS input process works, how the data entry screens are arranged, and the precise data that needs to be entered. It is also essential those staff are aware of when the data must be saved.	Not started		Not Started
To help ensure information is entered completely and accurately, checklists should be provided and used when inputting all nominations into the EMS system.	Not started		Not Started
Every nomination should be physically date and time stamped on receipt so that evidence is available should it be required (as was the case in one incident at this election). Too much reliance was given to the EMS recording that information.	Completed	All nominations now date stamped when received	Completed
It was reported the EMS processing time was slow and contributed towards some of the inputting errors that transpired. This issue should be taken up with the EMS supplier to seek a solution, with the technical support of the Corporate IT team.	Ongoing	Regular fortnightly meetings have been set up with democracy counts to review issues with system. Client meetings have also been set up	Ongoing
Data inputting should be checked for accuracy on an ongoing daily basis. This will help with identifying common errors or issues of concern, and with the timely production of the various notices required following the close of nominations.	Not started		Not Started
In all instances, data should be checked by reference to the source documentation, for example the physical nomination paper. Ideally, it should be done by individuals not involved in the inputting process, by reference to checklists developed for the specific tasks, for example the checking of ballot papers should include specifically checking the number of candidates for whom electors may vote.	Not started		Not Started
The system for the filing of the physical nomination papers must be organised, clear and simple. It is essential the papers can be found easily so that the checking and validation processes can proceed efficiently. Consideration could be given to sub-dividing the filing system into the two sovereign district areas, sub-dividing again into parishes within those areas, and then delegating responsibility for the four areas to individual officers.	Not started		Not Started
With the support of the corporate IT team, discussions should be had with Democracy Counts in respect of the individual issues faced at these elections. It is essential the users of the system have confidence in its operation	Commenced	Regular fortnightly meetings have been set up with democracy counts to review issues with system. Client meetings have also been set up	Ongoing

Every user of the system should receive the necessary training in its operation in respect of their areas of responsibility. We formed the view that some of the issues experienced may have been because of lack of understanding of the processes to be followed within the system.	Commenced	Training has been undertaken with democracy counts and AEA. Team have visited ESDC and will attend User Group. Further ongoing training is planned	Ongoing
At future elections, the system should be set up and tested much earlier than was the case on this occasion. We recognise there may have been issues preventing an earlier set up at these elections, but that contributed to the challenges faced. The corporate IT team should be fully involved in assisting where necessary.	Commenced	Training being undertaken with democracy counts to have test plan up and tested before end of December	Ongoing
The method for the reporting and escalation of issues, primarily to Democracy Counts, should be reviewed by the Electoral Services and corporate IT teams to improve effectiveness and resolution time.	Ongoing	Regular fortnightly meetings have been set up with democracy counts to review issues with system. Client meetings have also been set up	Ongoing
There is an opportunity at the casual vacancy elections in June to set up the election and use the system in less pressurised and overwhelming circumstances. This could enable procedures to be learned and recorded more effectively. Any issues can be reported and resolved with the software company to the benefit of future elections.	Commenced	Training being undertaken with democracy counts to have test plan up and tested before end of December	Ongoing
The development of a communications plan for future elections, detailing how candidates and agents will be given information before, during and after elections. This should be part of a wider public awareness plan to encourage participation.	Not started		Not Started
Identifying methods of communication to reach and inform as many candidates as possible, bearing in mind the geographical area of the two districts.	Not started		Not Started
A strategy for communicating clear information in the event of issues or errors, aiming to be proactive and transparent, and setting the narrative, should be developed.	Not started		Not Started
Identifying staff during the election process, and at the count, as points of contact for candidates and agents. Clear lines and examples of answers for common questions should be provided.	Not started		Not Started
The Declarations of Result for the contested parishes should be re-published so that unused votes are not incorrectly classified as "rejected in part", but as unused votes.	Completed	All results have now been republished	Completed
A thorough review of the challenges faced by the Electoral Services team in the delivery of these elections, identifying what resources and support will be required to mitigate risk in future.	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing
Questioning which aspects of the election process could be delivered by staff other than the core Electoral Services team. For example, recruitment of polling station staff, handling elector enquiries, proof-checking election materials, preparing ballot boxes and stationery, etc.	Not started		Not Started
Recognising that elections are much bigger than the business-as-usual processes of the Electoral Services team, and engendering a "one council" approach to their delivery and success within the extended leadership team.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Recognising that examples of positive support and collaboration exist and building on existing experience and expertise at future elections	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Encouraging and valuing the input of the core Electoral Services team and supporting services in the development of election and registration plans.	Commenced		Ongoing
To support the high-level project plan, and with the input of the core Electoral Services team and other supporting services, a more detailed delivery plan for future elections should be drafted that identifies key tasks at a more granular level.	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing

Ensure project team meetings continue to take place well in advance of scheduled elections, recognising that planning starts with the review of the previous election, and that they provide an opportunity to check and monitor progress effectively.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Consider having the oversight of the project plan managed by someone other than the ESM.	Not started		Not Started
The development of operational plans, process notes and checklists for all aspects of the delivery of an election, including (but not limited to): • Setting up an election in the EMS • Booking and equipping polling stations • Recruiting and training staff • Processing nominations • Producing notices and election materials • Operation of postal vote opening • Ballot box preparation • Management of the count	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Development of an electoral registration plan covering the timescales, tasks and deliverables for the annual canvass as well as plans for identifying new potential electors and maintaining the register throughout the year.	Commenced		Ongoing
Seeking out good practice from other authorities.	Commenced	Elections Team have visited East Suffolk DC and will attend AEA branch meetings, Demcoracy count user groups	Ongoing
Engendering a collaborative and team spirit culture, undertaking work to build the core team, developing the individual and collective strengths that are apparent and addressing those areas where issues prevent optimum team working.	Commenced	Away day held and regular 121's put in place. Process commenced for appointing a new Elecotral Services Manager.	Ongoing
Seeking out development opportunities to build the core technical skills, including attending elections training courses, software training, shadowing other electoral services teams, etc.	Commenced	Elections Team have visited East Suffolk DC and will attend AEA branch meetings, Demcoracy count user groups	Ongoing
Involving the team in the development of operational plans and process notes (see also the project planning section).	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing
Having regular opportunities to share knowledge, new processes and guidance at team meetings, etc.	Commenced	Elections Team have visited East Suffolk DC and will attend AEA branch meetings, Demcoracy count user groups	Ongoing
Encouraging individual team members to visit other local authorities to help understand how best to develop processes that will be of benefit to the electors of Babergh and Mid Suffolk.	Commenced	Elections Team have visited East Suffolk DC and will attend AEA branch meetings, Demcoracy count user groups	Ongoing
Benchmarking with other local authorities to test if the structure remains appropriate, and to build on good practice already developed elsewhere.	Commenced	Elections Team have visited East Suffolk DC and will attend AEA branch meetings, Demcoracy count user groups	Ongoing
Lessons learned and improvements that will relate to all types of elections but particularly ahead of the next scheduled elections – Police & Crime Commissioner (May 2024) and the General Election (before January 2025).			
Draft a comprehensive and robust elections team plan with key milestones, actions, dates, and responsibilities that can be used by the Elections and wider project team. Ensure it is drafted well ahead of the next election so it may be refined iteratively.	Commenced	Elections Team Away day key tasks and actions identified for drafting of project plan	Ongoing
Plan and conduct a 'test' election well before the next election period, to ensure business continuity and that processes and plans are robust.	Commenced	Training being undertaken with democracy counts to have test plan up and tested before end of December	Ongoing
Review the issues experienced with the elections system and ensure these are raised and resolved ahead of the next election.	Commenced	Regular fortnightly meetings have been set up with democracy counts to review issues with system. Client meetings have also been set up	Ongoing
In-depth training of the staff appointed by the RO to input nominations into the EMS. It is essential they fully understand how the EMS input process works, how the data entry screens are arranged, and the precise data that needs to be entered. It is also essential those staff are aware of when the data must be saved.	Not started		Not Started

At future elections, the system should be set up and tested much earlier than was the case on this occasion. We recognise there may have been issues preventing an earlier set up at these elections, but that contributed to the challenges faced. The corporate IT team should be fully involved in assisting where necessary.	Commenced	Training being undertaken with democracy counts to have test plan up and tested before end of December	Ongoing
The development of a communications plan for future elections, detailing how candidates and agents will be given information before, during and after elections. This should be part of a wider public awareness plan to encourage participation.	Not started		Not Started
Identifying staff during the election process, and at the count, as points of contact for candidates and agents. Clear lines and examples of answers for common questions should be provided.	Not started		Not Started
Recognition of the forthcoming challenges in implementing Phase 2 of the Elections Act 2022 measures, implementing parliamentary boundary changes, preparing for the UK parliamentary general election (at potentially 25 working days' notice), and preparing for the scheduled PCC polls in 2024 and Suffolk County Council polls in 2025.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
To support the high-level project plan, and with the input of the core Electoral Services team and other supporting services, a more detailed delivery plan for future elections should be drafted that identifies key tasks at a more granular level.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
Ensure project team meetings continue to take place well in advance of scheduled elections, recognising that planning starts with the review of the previous election, and that they provide an opportunity to check and monitor progress effectively.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
A corporate project team be established to consider: <ul style="list-style-type: none"> • The impact the phase one Elections Act 2022 measures (voter ID and accessibility) will have on future elections and referendums. • The impact the phase two measures (including online absent voting, the handling of postal ballot papers, EU citizens candidacy and voting rights and the changes to the overseas electors' franchise) are likely to have. • Early planning for the PCC (due May 2024), the UK Parliamentary general election (due before the end of January 2025), and Suffolk County Council elections (due May 2025). • The impact of the changes to the parliamentary constituency boundaries that will be reported to Parliament by 1 July 2023. 	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
We consider careful consideration should be given to attempting to resolve or mitigate the space challenge ahead of the PCC elections in May 2024.	Commenced	New venue identified with space for postal votes and ballot box packing	Ongoing
Implementation of the changes needed in response to the further changes in electoral law.			
A corporate project team be established to consider: <ul style="list-style-type: none"> • The impact the phase one Elections Act 2022 measures (voter ID and accessibility) will have on future elections and referendums. • The impact the phase two measures (including online absent voting, the handling of postal ballot papers, EU citizens candidacy and voting rights and the changes to the overseas electors' franchise) are likely to have. • Early planning for the PCC (due May 2024), the UK Parliamentary general election (due before the end of January 2025), and Suffolk County Council elections (due May 2025). • The impact of the changes to the parliamentary constituency boundaries that will be reported to Parliament by 1 July 2023. 	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing
As a minimum, the ERO/RO, ESM and core Electoral Services team be encouraged to attend training and development on the Elections Act changes as they arise, and to share that knowledge with the extended leadership team and elected members of both councils.	Commenced	Training on the proposed changes being undertaken by key members of staff. Discussions already taking place with democracy counts.	Ongoing

Map the changes in elections legislation to ensure that we are fully prepared for the next election and have appropriate communication and support in relation to this.	Commenced	Training on the proposed changes being undertaken by key members of staff. Discussions already taking place with democracy counts.	Ongoing
Recognition of the forthcoming challenges in implementing Phase 2 of the Elections Act 2022 measures, implementing parliamentary boundary changes, preparing for the UK parliamentary general election (at potentially 25 working days' notice), and preparing for the scheduled PCC polls in 2024 and Suffolk County Council polls in 2025.	Commenced	Corporate Election Project Team (CEPT) constituted and regular meeting dates in diary	Ongoing

Agenda Item 8

BABERGH and MID SUFFOLK DISTRICT COUNCILS

COMMITTEE: Joint Audit and Standards Committee	REPORT NUMBER: JAC/23/09
FROM: Melissa Evans, Director, Corporate Resources	DATE OF MEETING: 25 September 2023

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) UPDATE

1. PURPOSE OF REPORT

1.1 At its meeting on 17th May 2021, the Joint Standards and Audit Committee considered a report on ESG Investments, report JAC/20/19. The recommendations were as follows:

- That the Joint Audit and Standards Committee recommends that the Cabinet pushes its fund managers to filter investments in respect of the ESG considerations, looking for positive contributions to tackling our carbon reduction priorities and that the Cabinet considers withdrawing funds from investors who do not adequately address these concerns.
- The Joint Audit and Standards Committee recognises that any decision to withdraw funds should be balanced against financial prudence.

1.2 Both Cabinets at that time took the decision to monitor treasury investments for each of the ESG aspects and look to make changes to investments at an appropriate time that would strengthen ESG performance but within acceptable financial considerations.

1.3 The purpose of this report is to provide an update on the Councils investment positions and explore some alternative funds in the market with a greater emphasis on ESG.

1.4 Arlingclose, the Council's treasury advisors were commissioned to prepare a report covering three broad options:

- Hold: the ESG credentials of the Council's existing strategic pooled funds
- Switch: the risk and return implications of switching to funds with a greater emphasis on ESG
- Sell: the risk and return implications of selling out of funds entirely to minimise the future borrowing need

1.5 The principles of Security, Liquidity and Yield, as set out in the CIPFA Treasury Management Code and MHCLG Investment Guidance, remain at the heart of local authority treasury decisions and risk management. Incorporation of an ESG policy must not lead to a greater risk of incurring losses from defaults or of receiving unsuitably low investment income.

1.6 The Councils treasury activity should demonstrate compliance with CIPFA's treasury codes; therefore any future borrowing need would require assessment whether the

use of proceeds from the divestment of one or more existing pooled funds will help prudently manage treasury risks and optimise net treasury costs.

- 1.7 Should a decision be taken to divest from one or more of the existing funds, the timing of redemption should be carefully considered to mitigate, to the extent possible, crystallising capital losses. At the current time, the funds' valuations are currently significantly below the initial investment.

2. OPTIONS CONSIDERED

- 2.1 No options were considered for recommendation.

3. RECOMMENDATIONS
3.1 The contents of this report and the confidential appendix A be noted
REASON FOR DECISION
Not relevant for this report.

4. KEY INFORMATION

Existing funds

- 4.1 The Councils use Money Market Funds and the Government's Debt Management Office deposit account for short-term investment purposes and to manage daily cash flow requirements.
- 4.2 As bank securities make up the largest proportion of a Money Market Fund, governance is the dominant of the ESG factors considered when deciding on an issuer's inclusion in a portfolio.
- 4.3 In recent years however, some Money Market Funds have been launched which apply exclusionary criteria, such as limiting exposure to fossil fuels. Given that most of a Money Market Fund's investments are with financial institutions, whose revenues from the excluded sectors are typically below the thresholds set, these exclusions are unlikely to make a substantial difference to a Money Market Fund's investable universe.
- 4.4 In addition to its Money Market Funds, each Council has £11m of externally managed strategic pooled equity, property and multi assets funds where short-term security and liquidity are lesser considerations, and the primary objectives instead are regular revenue income and long-term price stability.

- 4.5 These funds are held with different counterparties and cover a range of asset classes to reduce risk. The funds in which the Councils are invested are detailed below.

Fund	Asset class	Investment Amount
CCLA: LAMIT Property Fund	Property	£5,000,000
Ninety One (Investec): Diversified Income Fund	Multi Asset	£2,000,000
Schroders: Income Maximiser Fund	UK Equity	£2,000,000
UBS: Multi Asset Income Fund	Multi Asset	£2,000,000

Performance of pooled funds

- 4.6 The income returns for the Councils existing funds from 31st August 2015 to 31st May 2023 are shown below.

Fund	Investment	Income Return Annualised
CCLA	£5m	3.74% BDC 3.70% MSDC
Ninety One (Investec)	£2m	3.70%
Schroders	£2m	6.02%
UBS	£2m	3.74% BDC 3.92% MSDC
Total	£11m	4.10% BDC 4.13% MSDC

Cost of exiting pooled funds

- 4.7 The Councils strategic pooled funds are held as long-term investments. Although the total overall return for each of these funds since investment has been positive, they have incurred unrealised capital losses.
- 4.8 Since 2018/19 the International Financial Reporting Standards for pooled funds states that changes in valuations must be taken through the Comprehensive Income and Expenditure Statement (CIES). The MHCLG has granted a statutory override until 31st March 2025 so these changes will have no impact on the “bottom line”.
- 4.9 However, upon sale/redemption of these funds any unrealised capital loss has to be recognised in the CIES. This would be a real cost to the Councils and impact on revenue budgets.
- 4.10 The revenue cost to the Councils of redeeming the existing pooled funds, based on valuations at 31st May 2023 would be as shown below;

Babergh	Purchase Price	Valuation at 31st May 2023	Cost to revenue
CCLA – LAMIT Property Fund	£5,000,000	£4,718,274	£281,728
Ninety One (Investec) Diversified Income Fund	£2,000,000	£1,777,488	£222,512
Schroder Income Maximiser Fund	£2,000,000	£1,529,319	£470,681
UBS Multi Asset Income Fund	£2,000,000	£1,438,631	£561,369
Total	£11,000,000	£9,463,712	£1,536,289

Mid Suffolk	Purchase Price	Valuation at 31st May 2023	Cost to revenue
CCLA – LAMIT Property Fund	£5,000,000	£4,645,294	£354,707
Ninety One (Investec) Diversified Income Fund	£2,000,000	£1,777,488	£222,512
Schroder Income Maximiser Fund	£2,000,000	£1,529,319	£470,681
UBS Multi Asset Income Fund	£2,000,000	£1,436,089	£563,911
Total	£11,000,000	£9,388,190	£1,611,811

5. LINKS TO THE JOINT CORPORATE PLAN

- 5.1 This report links to the ambition to be carbon neutral by 2030 in the Joint Corporate Plan. The fund managers for the Councils strategic pooled funds are performing well with regards to the integration of ESG factors into their investment decisions and company engagement.
- 5.2 The income generated by the Councils pooled fund investments contributes to the resources available to the Councils to meet the ambitions of the Joint Corporate Plan.

6. FINANCIAL IMPLICATIONS

- 6.1 Since inception to 31st May 2023, Babergh and Mid Suffolk’s existing funds have provided total income of £3.4m and £3.2m respectively.
- 6.2 At 31st May 2023, the unrealised capital losses on Babergh and Mid Suffolk’s pooled fund portfolios were £1.53m and £1.61m respectively. The statutory override on accounting for gains and losses on pooled investment funds has been extended to 31st March 2025, which ensures that any volatility in fair values does not impact the income and expenditure statement until that date unless funds are sold.
- 6.3 Selling one or more funds at a redemption value below their purchase price, whether before the expiry of the override, will entail crystallising a capital loss. Timing the sale is therefore important, as the quantum of potential capital loss may represent a significant financial implication.
- 6.4 The prevailing market outlook suggests that a bearish market characterised by economic uncertainty, persistent inflation concerns, and a hawkish stance from the

Bank of England regarding interest rate hikes. These factors contribute to a highly volatile bond and equity market environment. If the Councils are contemplating selling their funds, it would be prudent to exercise a watching brief for signs of a potential shift in market sentiment towards a more optimistic and bullish market outlook. Strategically timing any redemption from the funds will therefore be of essence.

7. LEGAL IMPLICATIONS

7.1 There are no legal implications arising from this report.

8. RISK MANAGEMENT

8.1 Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures	Risk Register and Reference*
We may be unable to react in a timely and effective way to financial demands.	3	3	The timing of redemption needs to be carefully managed to mitigate crystallising capital losses	Strategic Risk Register SRR004BDC/MSDC

9. CONSULTATIONS

9.1 None.

10. EQUALITY ANALYSIS

10.1 An equality analysis has not been completed because the report content does not have any impact on the protected characteristics.

11. ENVIRONMENTAL IMPLICATIONS

- 11.1 All Council activities are being reviewed as part of the work recommended by the Climate Change Task Group and the subsequently agreed Action Plan to support the Councils ambition to be carbon neutral by 2030.
- 11.2 A key focus of this report is the consideration of the environmental impact of the Councils treasury management investments.

12. APPENDICES

Title	Location
<u>CONFIDENTIAL NOT FOR PUBLICATION</u> Arlingclose ESG Investment Report	Appendix A

Agenda Item 10

By virtue of
Regulation 21(1)(A) of the Local Authorities (Executive
Arrangements) (Access to Information) (England)
Regulations 2000.

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Agenda Item 12

JOINT AUDIT AND STANDARDS COMMITTEE FORWARD PLAN 2023/24

Item	Purpose	Lead Officer
Date of Committee – 25 September 2023		
Elections Review	For comment and agreement	Chief Executive
Environmental, Social and Governance (ESG) Update	For comment and agreement	Director - Corporate Resources
Date of Committee – 27 November 2023		
Treasury Management Half Year Report 2023/24	For comment and agreement	Director - Corporate Resources
Mid Term Internal Audit Report	For comment and agreement	Corporate Manager - Internal Audit
Annual Risk Management Strategy Update	For comment and agreement	Corporate Manager - Strategic Policy
Date of Committee – 29 January 2024		
Treasury Management, Capital and Investments Strategy 2024/25	For comment and agreement	Director - Corporate Resources
Complaints Monitoring Report	To note	Monitoring Officer
Date of Committee – 25 March 2024		
Managing the Risk of Fraud and Corruption - Annual Report	For comment and agreement	Corporate Manager - Internal Audit
Internal Audit Plan 2024/25	For comment and agreement	Corporate Manager - Internal Audit

Items not scheduled

- Arlingclose Treasury Management Training
- Statement of Accounts and Auditors Report 2020/21

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